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Attorneys for Plaintiff
 Patrick Grannan

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PATRICK GRANNAN, ON BEHALF OF
HIMSELF AND ALL OTHERS
SIMILARLY SITUATED,

Plaintiffs,

vs.

ALLIANT LAW GROUP, P.C.,

Defendant.

CASE NO. CV 10 – 02803 HRL

CLASS ACTION

DECLARATION OF DOUGLAS J.
CAMPION IN SUPPORT OF
REQUEST FOR ATTORNEY'S FEES
AND COSTS

MAGISTRATE JUDGE
HOWARD R. LLOYD

Hearing Date: November 1, 2011

Time: 10:00 a.m.

Courtroom: 2

I, Douglas J. Champion, declare:

1. I am the attorney for the Plaintiff in this action, and named as Class Counsel for the Settlement Class in the Court's June 22, 2011 Order preliminarily approving the settlement. I submit this declaration in support of the Motion for Attorney's Fees and Costs to be heard concurrently with the Final Approval Motion.. I am licensed to practice law before this court and all California state courts and all federal courts located in the State of California. If called as a witness, I would competently testify to the matters herein from personal knowledge.

Fees Incurred

2. I am seeking a fee award based upon a percentage of the \$1,000,000 common fund recovered for the class. The \$1,000,000 was deposited to the settlement bank account established by the Claims Administrator shortly after Preliminary Approval for funding costs of notice and setting up the claims procedures, as required in the Preliminary Approval Order.
3. Although I am seeking 25% of the common fund under the 9th Circuit's percentage method of computing attorney's fees, I have attached hereto as **Exhibit A** true and correct copies of my time sheets which list by entry for each task the time I have incurred in litigating this case to date, and I anticipate incurring an additional 20 to 30 hours to finish the work necessary on this case, including overseeing the claims administration, following up on the Gilardi Declaration, and preparing for and appearing at the final approval hearing. The total of attorney time I have incurred to date according to those records is 234.10 hours. I have billed my time in this case at \$625 per hour, which is my current billing rate and has been my hourly rate since prior to the filing of this case. Thus, I have a lodestar of \$151,942.50, i.e., 234.10 hours times \$625. I understand the Court may desire to use that lodestar in its analysis of determining a fair and reasonable fee. By my computations, I believe the fee requested results in a multiplier of 1.64. Those hours incurred were all necessary to the successful litigation of this case. In addition, my hourly rate is reasonable in the legal community among attorneys litigating class actions and is actually less than many of my co-counsel with similar backgrounds and experience. I have attached a true and correct copy of the National Law Journal article dated December 10, 2007 as **Exhibit B** setting forth the results of their annual law firm billing survey. It indicates that partners in California firms, or California offices of national law firms, with my experience, have billing rates in excess of the \$625 hourly rate that I have billed here. For example, Fenwick & West, a Mountain View firm, in 2007 billed its partners at a

1 median rate of \$600 per hour, with a low of \$500 and a high of \$775. Furthermore, I
2 have attached as **Exhibit C** a true and correct copy of a declaration I have requested to
3 be prepared by a local San Jose attorney James L. Dawson, of Gates Eisenhart
4 Dawson, in which he states it is his opinion that such a billing rate is in the range of
5 reasonable rates for such class action attorneys in the local San Jose legal community.
6 Thus, my hourly rate is within the range of other counsel doing this same type of legal
7 work.

8 **Costs Incurred**

9 4. I have incurred certain costs in the litigation of this case, including filing fees, service
10 fees, overnight mail delivery fees, travel expenses including airfare and a car rental
11 fee. I will submit an additional bill for a car rental cost that I expect to incur for the
12 Final Approval hearing on November 1, 2011. Those costs that I have incurred for my
13 office expenses total \$1,216.39 and are broken down on **Exhibit D** attached hereto.
14 These costs are from my office's records kept in the normal course of events as the
15 costs are incurred. If the Court desires, I can provide proof of those costs incurred.

16 5. An additional cost incurred by my office is for the Hansen Levey Forensics firm,
17 specifically Jeff Hansen of that firm, which I engaged as consultants to analyze the
18 electronic data provided by Defendant in discovery. Mr. Hansen's resume is attached
19 hereto as **Exhibit E**. These TCPA cases involve the production of electronic data that
20 contain the Defendant's outbound dial lists, and outbound dial campaigns, in which all
21 outbound numbers called by the Defendant are provided on DVDs or CDs. In this
22 case there were over a million separate calls analyzed that were made by Defendant,
23 from which the 137,981 separate cell phone numbers were extracted after comparison
24 with known cell block identifiers. In addition, Defendant's records reflected a number
25 of cell phones that did not have the addresses or names of persons associated with
26 them, about 20%, so Mr. Hansen was required to work with the Defendant's
27 information technology person over several months after a settlement in principle was
28

1 reached. The Hansen Levey Forensics invoice reflects a charge of \$14,316.50, which
2 I believe is very reasonable for this type of work. A true and correct copy of that
3 invoice is attached hereto as **Exhibit F**. I seek the Court's approval of the payment of
4 all costs incurred from the Settlement Fund. All of those costs were reasonable and
5 necessary for this litigation.

6 6. Since the filing of the Complaint, Defendant has terminated its business of engaging in
7 collections and making collection calls. As a result, the Parties settled on the payment
8 of policy limits to settle the case. No amount of the policy will be returned to the
9 Defendant, as this is a non-reversionary settlement. The amount to be provided on a
10 pro rata basis to each of the 137,981 class members, after deducting the costs of
11 litigation including attorney's fees. The amount paid to each claimant of course
12 depends on the amount of claims submitted, as the amount remaining after costs of
13 notice and administration, attorneys' fees and costs of litigation will be divided
14 equally among those who make valid claims. It appears that the amount paid to each
15 claimant will be approximately \$334.96, based upon the present numbers.

16 7. In addition, the Parties agreed upon a Stipulated Injunction to ensure that even if
17 Defendant went back into the collection business, it would compare the phone
18 numbers it calls to lists of known cell phone numbers to make certain such cell phone
19 numbers are not called, without prior express consent.

20 8. Gilardi & co., LLC ("Gilardi") is the independent third party claims administrator that
21 provided the Notice to the Class, published Notice in the USA Today, a national
22 publication, disseminated a press release about the settlement, set up the settlement
23 website at www.allianttcpalawsuit.com, established an 800 number and an online
24 procedure for filing claims, and has handled all the submission of claims and any
25 questions about the process on behalf of the Settlement Class. Gilardi is the
26 independent third party third Claims Administrator approved by the Court in the
27 Preliminary Approval Order. They have incurred costs for their services rendered in
28

1 this case as well. They originally provided a proposal that estimated a cost of
2 \$127,047 for a claims response rate of 1% to \$147,414 for a claims response rate of
3 10%. See a true and correct copy of that March 14, 2011 proposal attached hereto as
4 **Exhibit G**. However, the final bill that I recently requested includes their charges for
5 services through the end of the case, including all other work that is necessary to finish
6 the case, including payment of all claims, and that bill is \$121,840.25. That amount is
7 less than the minimum amount quoted in the original proposal by over \$5,000. A true
8 and correct copy of that invoice is attached hereto as **Exhibit H**. I seek the Court's
9 approval for the payment of Gilardi for their services in that amount.

10 **Adequacy of Settlement**

11 9. We have achieved an excellent result for the Class in this statutory damages case. I
12 was able to obtain an "all in", non-reversionary settlement of \$1,000,000, the entire
13 insurance proceeds available for the Defendant. Since the filing of the Complaint,
14 Defendant has terminated its business of engaging in collections and making
15 collection calls. As a result, the Parties settled on the payment of policy limits to settle
16 the case. In addition, a Stipulated Injunction has been entered into that will further
17 protect citizens from such calls, should Defendant decide to get back into this business
18 within the next 12 months. That would require that Defendant compare the phone
19 numbers it calls to lists of known cell phone numbers to make certain such cell phone
20 numbers are not called, without prior express consent.

21 10. No Class member has lost any money as a result of the Defendant's actions, other
22 than their carrier's billing them for the cost of Defendant's cell phone call(s).
23 Therefore, the deterrent effect of statutory damages has been met, and the proceeds
24 will be divided among the persons called. In other words, the Class members are not
25 getting a percentage of money they have lost; they are receiving money as statutory
26 damages for cell phone calls made to them. Therefore, obtaining a \$1,000,000
27 settlement for the 137,981 potential claimants to divide is an exemplary settlement,
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1 especially when that is the entire policy available and that Defendant is no longer in
2 business. I set up a very simple claims process that only required a call to an 800
3 telephone number or an online submission of a claim, confirming that the claimant
4 was the person in the class, by name of telephone number. No declaration under
5 penalty of perjury was required, no mailing of a cumbersome, or any, claim form was
6 required. A pro rata award will be made based upon the number of claims. The notice
7 of settlement resulted in 1,814 claims submitted so far. Based upon the requested
8 amounts incurred for litigation costs and attorney's fees, and the incentive payment
9 requested, those costs total \$392,373.14, leaving a Claims Fund of \$607,626.86. That
10 would result in each of the present claimants receiving \$334.96. As a result, in my
11 opinion, based upon my thirty-four years of experience in civil litigation and twenty-
12 two years of experience in litigating class actions, and based upon the facts of this
13 case, the number of class members, and the other circumstances, I believe this
14 settlement is fair and reasonable. In my opinion, the settlement merits Court approval
15 and also justifies my request for 25% of the common fund as my fee. Additionally, I
16 believe such a result justifies the multiplier of the lodestar requested here, if the Court
17 is inclined to use the lodestar analysis in determining or cross-checking the fee.

18 **Class Counsel's Experience**

19 11. The Law Offices of Douglas J. Campion has been confirmed as class counsel for
20 purposes of this action and proceeding with the settlement. I am the only principal
21 and only attorney in my law firm. I was admitted to the State Bar of California in
22 1977 and have been a member in good standing since that time. Since my
23 admission, I have been engaged in litigation and I have had extensive experience in
24 business litigation prior to working in the class action field. In 1989, I joined the
25 San Diego office of a Philadelphia law firm, Barrack, Rodos & Bacine. Our office
26 engaged in class and derivative litigation exclusively, primarily specializing in
27 plaintiff's class action securities cases. I resigned from the firm in 1996. Barrack,
28

1 Rodos & Bacine was often co-counsel with Milberg Weiss Bershad Hynes & Lerach
2 in class actions and litigated the same types of cases.

3 12. I feel my experience both in other firms and with my own firm for the past ten years
4 supports my request for attorney's fees. A few examples of the cases our firm
5 litigated, separately or with co-counsel, and in which I actively participated, are as
6 follows:

- 7 a. The Michael Milken – Drexel securities litigation, with a joint recovery for all
8 plaintiffs of more than a billion dollars;
- 9 b. The savings and loan securities and derivative litigation of the early 1990's, in which
10 I represented or litigated against California Federal, Far West Financial, Financial
11 Corporation of Santa Barbara, Imperial Savings, and others;
- 12 c. Defense contractor over-billing cases, including Lockheed, General Dynamics, and
13 Rockwell International;.
- 14 d. A number of health care provider cases including National Health Laboratories,
15 National Medical Enterprises, ICN Pharmaceuticals, and Pfizer;
- 16 e. Cases against insurance companies including Blue Cross of California, and First
17 Executive Life and its progeny; and
- 18 f. Many other class and derivative actions including L.A. Gear, Countrywide
19 Trucking, and Glen Ivy timeshares, among others.

20 13. I have also been lead or co-lead counsel in many other class actions or Business &
21 Professions Code representative actions since I opened my own office about five
22 years ago. Most of those are consumer-related cases. I recently participated as co-
23 lead counsel in the TCPA case of Arthur v. SLM Corp., Case No. 10-cv-00198 JLR,
24 Western District of Washington, in which we settled on behalf of more than 7 million
25 class members for over \$24 million and injunctive and other relief. Some other class
26 or 17200 representative actions in which I was lead or co-lead counsel since I opened
27 my own office in 2001 are the following:
28

- 1 a. Gonzalez, et. al., v. Science Applications International Corporation, et. al. (state
- 2 court);
- 3 b. Warner, et al. v. Computer Education Institute, et al. (state court),
- 4 c. Smith v. Microskills (state court);
- 5 d. Russell, et al., v. DAT, Inc. dba Laptop Training Solutions (state court);
- 6 e. Jared Smith vs. Independent Capital Management, Inc., et al. (state court);
- 7 f. Orttman and Opyrchal, et al., v. New York Life (federal court);
- 8 g. Bowersox v. Laboratory Corporation of America (state court);
- 9 h. O'Neal v. NCO Financial Systems, Inc. (federal court);
- 10 i. McDonald v. Bonded Collectors, Inc. (federal court);
- 11 j. In Re Brocade Derivative Litigation (state court);
- 12 k. Kryptonite Locks Coordinated Litigation (state court);
- 13 l. Shaw v. Tenet Healthcare Corporation, et al. (federal court);
- 14 m. Rodriquez v. Yum Yum Donut Shops, Inc. (state court);
- 15 n. Arn, et al., v. West Coast Aquarium Industries, Inc. (state court);
- 16 o. Grant v. American Agencies, Inc. (federal court);
- 17 p. Rogers v. Whitney Education Group (state court);
- 18 q. Khosorabi v. North Shore Agency, Inc. (federal court);
- 19 r. Goins v. Checks Cashed for Less, Inc., et al. (state court);
- 20 s. Fanciullo v. CompuCredit dba Aspire VISA (federal court);
- 21 t. Kight v. Eskanos & Adler, P.C. (federal court);
- 22 u. Gulzynski v. Fidelity Title (federal court);
- 23 v. Kight v. CashCall (state court);
- 24 w. Grannan v. Direct Electronics, Inc. (state court);
- 25 x. Bellows v. NCO Financial, Inc. (federal court);
- 26 y. Adams v. AllianceOne, Inc. (federal court);
- 27 z. American Apparel, Inc. Derivative Litigation (federal court);
- 28

- 1 aa. Arthur v. Sallie Mae (federal court);
- 2 bb. Connor v. JP Morgan Chase, et. al. (federal court);
- 3 cc. Meeks v. CreditWest, et. al. (state court);
- 4 dd. Shirdel v. Access Group, Inc (federal court);
- 5 ee. Malta v. Wells Fargo (federal court);
- 6 ff. Robinson v. Midland Funding, LLC (federal court);
- 7 gg. Bennett v. Discover Bank (federal court);
- 8 hh. Dominici v. Wells Fargo (federal court);
- 9 ii. Hurtado v. Progressive Financial Services (federal court);
- 10 jj. Galbraith v. Resurgent (federal court);
- 11 kk. Nicosia v. First Financial Security, Inc. (state court);
- 12 ll. Underwood v. San Diego Flight Training, Inc. (state court);
- 13 mm. In Re Jiffy Lube Multi-District Litigation (federal court);
- 14 nn. Robinson v. Midland Funding, LLC, et al. (federal court).

15 **Risk of Non-Payment and Delay in Payment**

16 14. Whenever I file a class action case, I face a very real risk of non-payment for a number
 17 of reasons. First, I only recover a fee in a case in which I am successful in litigating
 18 the claims. Second, even if I am successful, I face a risk that the defendant will
 19 disappear or file for bankruptcy. That has happened to me personally three time in
 20 the past ten years, costing me more than \$600,000 in fees that I would have otherwise
 21 been paid. And even when I don't get paid, I am still responsible for paying all of the
 22 costs I have incurred in any such action. Here the law firm ceased doing business,
 23 but fortunately they has malpractice insurance which I was able to secure to fund the
 24 settlement here. Furthermore, because these TCPA cases are not fee shifting cases, I
 25 rely upon and expect to be paid an enhancement of my hourly rate when I litigate
 26 such a case.

27 15. I have not been paid anything since this litigation began in June, 2010, approximately
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1 sixteen months prior to the Final Approval hearing and this fees motion. Such delay
2 results in paying overhead, lines of credit incurring interest charges and other
3 expenses.

4 **Complexity of the Issues and Novelty of the Issues**

5 16. I have been at the forefront of TCPA litigation for the past five years. Very few
6 attorneys litigate in this area of the law. There is very little case law, especially in the
7 9th Circuit. That often leads to the inability of both sides to even recognize potential
8 issues, and to agree on where those issues might lead. For example, because the
9 TCPA statute permits a federal action only if the state permits it, there are some states
10 that do not permit such cases, and some that have different statutes of limitations. In
11 other cases, the effect of the legal issue of prior express consent is not agreed upon,
12 both in its application and procedurally the manner in which that affirmative defense
13 is raised. Thus, counsel must be cognizant of evolving law across the country, in
14 different state and federal courts, just to keep up with these issues.

15 **Reaction of the Class to the Fees and Costs Request**

16 17. To date, there have been no objections to the fees and costs request of counsel.

17 **Inability to Take on Other Cases**

18 18. I am essentially a sole practitioner. I can only litigate a limited number of cases as a
19 result, especially a limited number of class actions that require much more work and
20 financial commitment than do other non-class cases. By taking on this case, I was
21 prevented from taking on other work, perhaps more financially rewarding work.
22 Therefore, I seek the percentage of the common fund or alternatively, a multiplier of
23 the lodestar to provide the same dollar amount of fees as a result.

24 **Disclosure of This Request for Fees and Costs to Class Members**

25 19. The pending request for attorney's fees and for all costs of litigation, including the
26 information technology costs and the costs of notice and claims administration, was
27 disclosed to the class members and the public with the notices and on the settlement
28

1 website. The postcard notice states: “[t]he attorneys are seeking to be paid from the
2 Common Fund attorney fees not to exceed \$250,000 and litigation expenses of no
3 more than \$30,000 and the expenses of notice and claims administration in an amount
4 not to exceed \$150,000”. The full notice on the settlement website
5 www.alliantcpalawsuit.com also lists all such fees and costs to be sought in this
6 motion as well: “Class Counsel intends to request at the Final Approval hearing that
7 the Court award up to 25% of the Common Fund as attorneys’ fees (\$250,000), and
8 also be reimbursed for costs of litigation, all to be paid from the \$1,000,000 Common
9 Fund. . . . Class Counsel intends to ask for an award of costs of litigation and other
10 related costs incurred in litigation in this matter, including expert witness fees, travel
11 costs, issuing press releases, service fees, and other costs. Class Counsel believes that
12 all such costs will be less than \$30,000. . . .Class Counsel will also seek Court
13 approval of the costs of giving Notice and providing claims administration in this
14 case, estimated to be up to the amount of \$150,000, depending on the number of
15 claims and other factors.” The website home page also carries a notice which
16 contains the anticipated fees and costs request: “The settlement also calls for payment
17 of certain costs from that Settlement Fund: the costs of notice and claims
18 administration (estimated to be up to approximately \$150,000, a \$5,000 incentive
19 payment paid to the Class Representative, subject to Court Approval, litigation
20 expenses and costs of approximately \$30,000, and attorneys’ fees of up to \$250,000,
21 subject to Court approval.” Thus, all class members have been advised of the
22 pending request for months and no one has objected to either the fees or the costs
23 requested.

24 I declare under penalty of perjury that the foregoing is true and correct.

25 Executed on September 27, 2011 at San Diego, California, pursuant to the laws of the United States.

26 /s/ Douglas J. Campion

27 Douglas J. Campion

EXHIBIT A

Fees and Expenses by Matter
 Period: 01/01/1990-09/26/2011

Douglas J. Campion
 Law Offices of Douglas J. Campion
 409 Camino Del Rio South, Suite 303
 San Diego, CA 92108

Page 1
 09/26/11

Date Status	Timekeeper	Transaction Type Description	Amount
Matter 312-1		Pat Grannan - Alliant Law Group Alliant Law Group	
06/15/10 Hold	DC	Fee: 5.20 hours @ \$625.00/hour Call from / to client; research on Alliant Law Group; pull other cases; Pacer search; draft complaint; register for efilng in Northern District; Read Local Rules for Northern District.	3,250.00 HOLD
06/22/10 Hold	DC	Fee: 2.70 hours @ \$625.00/hour Finish complaint; finalize other docs, letter to court; mail to court.	1,687.50 HOLD
06/28/10 Hold	DC	Fee: 0.60 hours @ \$625.00/hour Receive and review emails (4) from court re: electronic filing, standing orders, electronic service, etc. Print and electronically save all.	375.00 HOLD
06/29/10 Hold	DC	Fee: 0.80 hours @ \$625.00/hour Call from client; review NCAL procedures.	500.00 HOLD
07/01/10 Hold	DC	Fee: 0.50 hours @ \$625.00/hour Receive package from court; scan and copy documents for service.	312.50 HOLD
07/02/10 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Call to Kaminski about his firm's possible representation of defendant; scan and email docs to Kaminski.	187.50 HOLD
07/02/10 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Send docs to Knox Atty service with cover letter.	187.50 HOLD
07/06/10 Hold	DC	Fee: 0.80 hours @ \$625.00/hour Email from Alliant Law Group; call to Gregory Miller; call to client; call to Kaminski about his firm's possible representation; email to Miller.	500.00 HOLD
07/07/10 Hold	DC	Fee: 0.40 hours @ \$625.00/hour Emails to and from Miller, atty for Alliant, email to Knox Atty Service, call from client.	250.00 HOLD
07/19/10 Hold	DC	Fee: 0.50 hours @ \$625.00/hour Review and research filing procedures and same for courtesy copies; prepare and mail return of summons.	312.50 HOLD

Fees and Expenses by Matter

Period: 01/01/1990-09/26/2011

Date Status	Timekeeper	Transaction Type Description	Amount
07/20/10 Hold	DC	Fee: 0.40 hours @ \$625.00/hour Calls from / to Bruce MacLeod, atty for Alliant Law Group.	250.00 HOLD
07/20/10 Hold	DC	Fee: 0.10 hours @ \$625.00/hour Email to Kaminski about possiblity his firm might be repreesnting defendant.	62.50 HOLD
07/23/10 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Review court website; review local rules.	187.50 HOLD
07/23/10 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Email to MacLeod.	125.00 HOLD
07/23/10 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Emails from and to MacLeod.	125.00 HOLD
08/03/10 Hold	DC	Fee: 0.80 hours @ \$625.00/hour Research local rules re: duties re: initial CMC and prior filings, meet and confer.	500.00 HOLD
08/03/10 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Email to opposing counsel MacLeod re: meet and confer.	187.50 HOLD
08/05/10 Hold	DC	Fee: 0.40 hours @ \$625.00/hour Emails to and from MacLeod; Call to MacLeod.	250.00 HOLD
08/10/10 Hold	DC	Fee: 2.70 hours @ \$625.00/hour Research; review file; make outline for disclosures; prepare for meet and confer; review local court rules.	1,687.50 HOLD
08/11/10 Hold	DC	Fee: 0.10 hours @ \$625.00/hour Call from MacLeod's secretary.	62.50 HOLD
08/16/10 Hold	DC	Fee: 1.20 hours @ \$625.00/hour Email to MacLeod, from same; efile docs re: ADR; mail overnight courtesy copies to court - chamber's copies. Email from and call to client.	750.00 HOLD
08/28/10 Hold	DC	Fee: 3.40 hours @ \$625.00/hour Review file; research; prepare Rule 26f Statement; draft Initial Case Management Statement; email to opposing counsel.	2,125.00 HOLD
08/30/10 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Receive and review email from oposing counsel with changes to	187.50 HOLD

09/26/11

Fees and Expenses by Matter

Period: 01/01/1990-09/26/2011

Date Status	Timekeeper	Transaction Type Description	Amount
		Joint filing.	
08/31/10 Hold	DC	Fee: 2.80 hours @ \$625.00/hour Finalize Joint Case Mgmt Statement for filing; call and emails to and from MacLeod; review file again, efile and prepare overnight express letter and courtesy copies.	1,750.00 HOLD
09/02/10 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Review court order re: CMC; call to clerk about Rule 26f statement; call to MacLeod about same.	187.50 HOLD
09/02/10 Hold	DC	Fee: 0.60 hours @ \$625.00/hour Prepare for and call from court re: ADR procedures; telephonic conference with opposing counsel and ADR person Robin Feitkin.	375.00 HOLD
09/02/10 Hold	DC	Fee: 0.50 hours @ \$625.00/hour Review file; prepare and serve Initial Disclosures.	312.50 HOLD
09/07/10 Hold	DC	Fee: 5.00 hours @ \$625.00/hour Travel to and attend Initial Case Management Conference in San Jose at Court. Counted travel time as half hourly rate.	3,125.00 HOLD
09/13/10 Hold	DC	Fee: 0.50 hours @ \$625.00/hour Prepare and email proposed confidentiality order.	312.50 HOLD
09/15/10 Hold	DC	Fee: 0.70 hours @ \$625.00/hour Work on discovery to be sent out.	437.50 HOLD
09/16/10 Hold	DC	Fee: 2.60 hours @ \$625.00/hour Draft discovery - interlogs and doc requests; review file; review complaint, etc. Serve Defendant.	1,625.00 HOLD
10/11/10 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Email to MacLeod re: protective order.	125.00 HOLD
10/11/10 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Received and reviewed letter from proposed mediator.	125.00 HOLD
10/12/10 Hold	DC	Fee: 0.10 hours @ \$625.00/hour Email to MacLeod.	62.50 HOLD
10/14/10 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Email from MacLeod with changes to protective order, review.	187.50 HOLD

Fees and Expenses by Matter

Period: 01/01/1990-09/26/2011

Date Status	Timekeeper	Transaction Type Description	Amount
10/15/10 Hold	DC	Fee: 2.20 hours @ \$625.00/hour Emails from defense counsel; put defense counsel's changes in protective order; call to same re: extension and production.	1,375.00 HOLD
10/18/10 Hold	DC	Fee: 0.90 hours @ \$625.00/hour Meet with Jeff Hansen re: exportable issues; email to MacLeod about database issues..	562.50 HOLD
10/20/10 Hold	DC	Fee: 0.80 hours @ \$625.00/hour Prepare for ADR phone call by reading ADR Local Rule 6; review case file, etc.	500.00 HOLD
10/20/10 Hold	DC	Fee: 0.50 hours @ \$625.00/hour ADR phone conference with mediator.	312.50 HOLD
10/27/10 Hold	DC	Fee: 2.20 hours @ \$625.00/hour Work on finalizing protective order; turn into a stip and order; review local rules on filing procedures for stip and order; review discovery responses from defendant; email protective order to defense counsel; call to defense counsel, left msg.	1,375.00 HOLD
10/28/10 Hold	DC	Fee: 1.30 hours @ \$625.00/hour Review documents produced; emails to and from MacLeod re: inadvertent production; substitute blank pages for same.	812.50 HOLD
10/28/10 Hold	DC	Fee: 0.60 hours @ \$625.00/hour Finalize Stip and Order; efile same; send copy to Chambers by overnight mail.	375.00 HOLD
11/01/10 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Verification received for responses.	125.00 HOLD
11/01/10 Hold	DC	Fee: 0.40 hours @ \$625.00/hour Email to MacCleod re: timing of production; response from same; my response to him.	250.00 HOLD
11/03/10 Hold	DC	Fee: 1.00 hours @ \$6,255.00/hour Review all discovery; emails to and from opposing counsel re: discovery and scheduling depositions.	6,255.00 HOLD
11/03/10 Hold	DC	Fee: 1.30 hours @ \$625.00/hour Letter to client; review discovery and summarize in letter; misc preparation.	812.50 HOLD

Fees and Expenses by Matter

Period: 01/01/1990-09/26/2011

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09/26/11

Date Status	Timekeeper	Transaction Type Description	Amount
11/03/10 Hold	DC	Fee: 1.60 hours @ \$625.00/hour Review interrogs and docs produced (further review).	1,000.00 HOLD
11/04/10 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Emails from and to MacLeod.	187.50 HOLD
11/04/10 Hold	DC	Fee: 0.10 hours @ \$625.00/hour Check with court website re: status of protective order.	62.50 HOLD
11/04/10 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Emails to and from MacLeod.	125.00 HOLD
11/09/10 Hold	DC	Fee: 0.40 hours @ \$625.00/hour Emails from MacLeod; emails in response to same; review discovery responses to respond.	250.00 HOLD
11/10/10 Hold	DC	Fee: 1.10 hours @ \$625.00/hour Review discovery ; try to set up depositions; email to MacLeod re: same, and about cd.	687.50 HOLD
11/16/10 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Call to Bruce MacLeod re: disc and depositions.	125.00 HOLD
11/19/10 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Call from client re: status.	125.00 HOLD
11/19/10 Hold	DC	Fee: 0.80 hours @ \$625.00/hour Receive disc; call to consultant; work with him on determining what is on disc with phone numbers; arrange meeting.	500.00 HOLD
11/21/10 Hold	DC	Fee: 0.50 hours @ \$625.00/hour Call from Jeff Hansen re: results of week-end of work.	312.50 HOLD
11/22/10 Hold	DC	Fee: 0.50 hours @ \$625.00/hour Meet with Jeff Hansen re: disc information and results.	312.50 HOLD
11/22/10 Hold	DC	Fee: 1.80 hours @ \$625.00/hour Prepare demand letter to defense counsel.	1,125.00 HOLD
11/22/10 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Emails from and to defense counsel's secretary re: depositions.	125.00 HOLD
11/22/10 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Review discovery responses in light of results obtained from disc	187.50 HOLD

Fees and Expenses by Matter

Period: 01/01/1990-09/26/2011

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09/26/11

Date Status	Timekeeper	Transaction Type Description	Amount
		review.	
11/22/10 Hold	DC	Fee: 0.70 hours @ \$625.00/hour Analysis of options now knowing amount of calls made.	437.50 HOLD
11/23/10 Hold	DC	Fee: 0.90 hours @ \$625.00/hour Call from MacLeod; revise demand letter; send to MacLeod by email and overnight mail.	562.50 HOLD
12/01/10 Hold	DC	Fee: 2.80 hours @ \$625.00/hour Call from / to Sheila Smith at MacLeod's office; review depo schedules; determine depositions and schedule; prepare discovery email and serve by overnight mail for all depositions.	1,750.00 HOLD
12/02/10 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Emails from and to Sheila Smith re: changes in scheduling for depositions.	187.50 HOLD
12/03/10 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Emails to and from opposing counsel re: settlement demand and acceptance.	187.50 HOLD
12/03/10 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Email to MacLeod re: any word on demand?	125.00 HOLD
12/03/10 Hold	DC	Fee: 0.80 hours @ \$625.00/hour Pull together materials for mediation brief; email to opposing counsel's assistant re: depositions.	500.00 HOLD
12/06/10 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Letter received from MacLeod re: acceptance of settlement demand.	125.00 HOLD
12/06/10 Hold	DC	Fee: 0.40 hours @ \$625.00/hour Emails to mediator and to MacLeod's office.	250.00 HOLD
12/07/10 Hold	DC	Fee: 4.70 hours @ \$625.00/hour Work on settlement agreement; call to Burke; email to opposing counsel and to Burke.	2,937.50 HOLD
12/08/10 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Emails from and to MacLeod re: addresses.	187.50 HOLD

Fees and Expenses by Matter

Period: 01/01/1990-09/26/2011

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09/26/11

Date Status	Timekeeper	Transaction Type Description	Amount
01/26/11 Hold	DC	Fee: 0.50 hours @ \$625.00/hour Email from MacLeod re IT persons; talk to Jeff Hansen; email to Hansen.	312.50 HOLD
01/27/11 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Call from and to client, left message.	125.00 HOLD
01/27/11 Hold	DC	Fee: 1.40 hours @ \$625.00/hour Meeting with Jeff Hansen; go over new disc and numbers; discuss alternatives.	875.00 HOLD
01/27/11 Hold	DC	Fee: 3.20 hours @ \$625.00/hour Revise settlement agreement; review opposing counsel's changes; make additional changes; email to opposing counsel.	2,000.00 HOLD
02/02/11 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Email from Jeff Hansen; call to Jeff Hansen re: status of getting further info from ALG's IT person in India.	187.50 HOLD
02/21/11 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Call from / to client re: status.	125.00 HOLD
02/22/11 Hold	DC	Fee: 0.50 hours @ \$625.00/hour Call to Jeff Hansen; email from MacLeod; emails to same.	312.50 HOLD
02/25/11 Hold	DC	Fee: 0.70 hours @ \$625.00/hour Review files; status; call to Jeff Hansen; Call to Bruce MacLeod.	437.50 HOLD
03/02/11 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Discussion with Jeff Hansen.	125.00 HOLD
03/04/11 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Call from Jeff Hansen re: received the data.	125.00 HOLD
03/08/11 Hold	DC	Fee: 0.40 hours @ \$625.00/hour Call to Jeff Hansen re: data received.	250.00 HOLD
03/10/11 Hold	DC	Fee: 0.50 hours @ \$625.00/hour Call from/to Jeff Hansen re: data in database sent to us; "final" list.	312.50 HOLD
03/11/11 Hold	DC	Fee: 2.20 hours @ \$625.00/hour Work on Settlement Agreement; email to opposing counsel.	1,375.00 HOLD

09/26/11

Fees and Expenses by Matter

Period: 01/01/1990-09/26/2011

Date Status	Timekeeper	Transaction Type Description	Amount
03/11/11 Hold	DC	Fee: 0.40 hours @ \$625.00/hour Try to open and review the database sent to me by Jeff Hansen; problems; email to Jeff; email the database to opposing counsel	250.00 HOLD
03/11/11 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Emails from and to Jeff Hansen re: data.	125.00 HOLD
03/14/11 Hold	DC	Fee: 0.10 hours @ \$625.00/hour Email to MacLeod with link for opening document.	62.50 HOLD
03/14/11 Hold	DC	Fee: 0.80 hours @ \$625.00/hour Review opposing counsel's proposed changes; call to him about them; negotiate changes; modify the Agreement; forward the latest version.	500.00 HOLD
03/14/11 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Call to Alan Vasquez at Gilardi re: costs and expenses.	125.00 HOLD
03/22/11 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Call from Bruce MacLeod.	125.00 HOLD
03/22/11 Hold	DC	Fee: 2.20 hours @ \$625.00/hour Draft short form notice.	1,375.00 HOLD
03/22/11 Hold	DC	Fee: 6.80 hours @ \$625.00/hour Work up, draft and revise settlement documents, including exhibits, notices, etc.	4,250.00 HOLD
03/23/11 Hold	DC	Fee: 3.60 hours @ \$625.00/hour Prepare and revise full Notice; correct short form notice; forward to other side.	2,250.00 HOLD
03/25/11 Hold	DC	Fee: 3.20 hours @ \$625.00/hour Work on prelim and final approval orders; review and revise prior orders; email to counsel; email to Gilardi & Co. re: notice and publication, settlement agreement terms, etc.	2,000.00 HOLD
03/28/11 Hold	DC	Fee: 0.40 hours @ \$625.00/hour Reviewed appraisal from Gilardi; reviewed notice; called Alan V at Gilardi, left mssg.	250.00 HOLD
03/30/11 Hold	DC	Fee: 0.10 hours @ \$625.00/hour Call to Alan Vasquez; left mssg.	62.50 HOLD

Fees and Expenses by Matter

Period: 01/01/1990-09/26/2011

Date Status	Timekeeper	Transaction Type Description	Amount
04/06/11 Hold	DC	Fee: 1.60 hours @ \$625.00/hour Work on Revisions to Settlement Agreement; email to opposing counsel.	1,000.00 HOLD
04/06/11 Hold	DC	Fee: 2.80 hours @ \$625.00/hour Work on preparing Prelim App brief.	1,750.00 HOLD
04/06/11 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Revision to Settlement Agreement; emailed.	125.00 HOLD
04/07/11 Hold	DC	Fee: 1.80 hours @ \$625.00/hour Work on mtn for prelim app; call and email to Alan Vasquez.	1,125.00 HOLD
04/11/11 Hold	DC	Fee: 0.60 hours @ \$625.00/hour Work on Prelim App brief; send to opposing counsel.	375.00 HOLD
04/11/11 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Call to Vasquez re: notice.	187.50 HOLD
04/12/11 Hold	DC	Fee: 1.80 hours @ \$625.00/hour Work on putting together final settlement agreement and exhibits to forward to opposing counsel.	1,125.00 HOLD
04/19/11 Hold	DC	Fee: 0.40 hours @ \$625.00/hour Review and then email all settlement docs to opposing counsel.	250.00 HOLD
04/20/11 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Emails from and to opposing counsel; resend some docs.	187.50 HOLD
04/21/11 Hold	DC	Fee: 1.20 hours @ \$625.00/hour Prepare declaration for client; prepare my declaration in support of prelim app and to be appointed class counsel.	750.00 HOLD
04/26/11 Hold	DC	Fee: 1.20 hours @ \$625.00/hour Email with changes from def's counsel; change docs; send to def's counsel by email.	750.00 HOLD
04/28/11 Hold	DC	Fee: 0.40 hours @ \$625.00/hour Review changes to brief; emails from and to MacLeod.	250.00 HOLD
04/29/11 Hold	DC	Fee: 5.70 hours @ \$625.00/hour Finalize settlement brief and other settlement documents; declarations, obtain signatures, etc.; emails from and to MacLeod.	3,562.50 HOLD

Fees and Expenses by Matter

Period: 01/01/1990-09/26/2011

Date Status	Timekeeper	Transaction Type Description	Amount
05/03/11 Hold	DC	Fee: 3.40 hours @ \$625.00/hour Receive final docs for submitting settlement to court; work on final documents; corrections to brief; review each document; look up local rules for efilng and proposed orders.	2,125.00 HOLD
05/04/11 Hold	DC	Fee: 3.80 hours @ \$625.00/hour Revise certificate of service; corrections of other papers; scan and file; calls to court; email to opposing counsel; efile all papers; overnight courtesy copies and draft letter to court; email proposed order..	2,375.00 HOLD
05/13/11 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Call to Alan Vasquez re: setting up bank account.	125.00 HOLD
05/13/11 Hold	DC	Fee: 0.10 hours @ \$625.00/hour Email to MacLeod about bank account.	62.50 HOLD
06/01/11 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Email to court re: status.	125.00 HOLD
06/02/11 Hold	DC	Fee: 0.10 hours @ \$625.00/hour Call to Vasquez re: bank account.	62.50 HOLD
06/06/11 Hold	DC	Fee: 0.40 hours @ \$625.00/hour Emails from and to Bruce MacLeod re: status of case.	250.00 HOLD
06/08/11 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Cal from law clerk to Judge Lloyd; email to Bruce MacLeod.	187.50 HOLD
06/16/11 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Review Order from court re: incentive award.	125.00 HOLD
06/16/11 Hold	DC	Fee: 3.30 hours @ \$625.00/hour Do research on response to court as requested in Interim Order.	2,062.50 HOLD
06/17/11 Hold	DC	Fee: 0.40 hours @ \$625.00/hour Call to / from client re: interim order.	250.00 HOLD
06/17/11 Hold	DC	Fee: 2.80 hours @ \$625.00/hour Work on letter brief re: incentive payment.	1,750.00 HOLD
06/17/11 Hold	DC	Fee: 3.60 hours @ \$625.00/hour Work on research for incentive payments letter brief; work on client declaration; email to and call with client.	2,250.00 HOLD

Fees and Expenses by Matter

Period: 01/01/1990-09/26/2011

Date Status	Timekeeper	Transaction Type Description	Amount
06/20/11 Hold	DC	Fee: 5.70 hours @ \$625.00/hour Work on researching incentive payments issue; further revisions to letter brief; further revisions to declaration.	3,562.50 HOLD
06/21/11 Hold	DC	Fee: 0.40 hours @ \$625.00/hour Emails to and from Vasquez.	250.00 HOLD
06/21/11 Hold	DC	Fee: 1.80 hours @ \$625.00/hour Prepare my declaration re incentive payments; finalize letter brief; efile same; send courtesy copies overnight mail; respond to Alan Vaquez' email re: defense counsel info.	1,125.00 HOLD
06/22/11 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Emails from and to Bruce MacLeod.	125.00 HOLD
07/05/11 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Emails from and to MacLeod.	187.50 HOLD
07/21/11 Hold	DC	Fee: 13.00 hours @ \$625.00/hour Review notice information; emails to Gilardi & Co.; email to client; notice of lien.	8,125.00 HOLD
07/22/11 Hold	DC	Fee: 0.40 hours @ \$625.00/hour Emails from and to Alan V. re: changes and revisions to notice docs.	250.00 HOLD
07/25/11 Hold	DC	Fee: 0.50 hours @ \$625.00/hour Emails and calls to and from Alan V. re: notice docs.	312.50 HOLD
07/26/11 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Call to Alan V. re: notice; deposit.	187.50 HOLD
07/27/11 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Received notice of lien and objection from atty for creditor; call to same.	187.50 HOLD
07/27/11 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Email to client re: objection filed.	125.00 HOLD
07/27/11 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Call from Alan Vasquez re: notice issue.	125.00 HOLD
07/28/11 Hold	DC	Fee: 0.40 hours @ \$625.00/hour Emails to and from Alan re: final review of certain settlement	250.00 HOLD

Fees and Expenses by Matter

Period: 01/01/1990-09/26/2011

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Date Status	Timekeeper	Transaction Type Description	Amount
		documents.	
07/29/11 Hold	DC	Fee: 2.20 hours @ \$625.00/hour Review settlement documents; make changes; email to Alan; call to Alan Vasquez.	1,375.00 HOLD
08/02/11 Hold	DC	Fee: 0.80 hours @ \$625.00/hour Draft stipulation to extend deadline and proposed order; email to Bruce MacLeod.	500.00 HOLD
08/02/11 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Email from Alan V.; call from Alan V. re: notice procedures.	187.50 HOLD
08/02/11 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Calls to and from Alan V. re: press release.	187.50 HOLD
08/03/11 Hold	DC	Fee: 1.10 hours @ \$625.00/hour Call to Alan; review press release and edit same; forward to Gilardi in email; review other press releases as well.	687.50 HOLD
08/03/11 Hold	DC	Fee: 2.20 hours @ \$625.00/hour Review final long form notice; compare to Court's changes in notice as changed; review and revise press release again; send draft to opposing counsel; emails to Gilardi & co. re: source issue.	1,375.00 HOLD
08/04/11 Hold	DC	Fee: 0.50 hours @ \$625.00/hour Email from Bruce MacLeod approving press release; email to Gilardi & Co.; attached final version approved by other side; email back from Chermus at Gilardi.	312.50 HOLD
08/04/11 Hold	DC	Fee: 0.50 hours @ \$625.00/hour Arrange for special rush filing of Stipulation to extend claims deadline; with Knox in San Jose; call to secretary; emails to and from Knox re: delivery.	312.50 HOLD
08/04/11 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Emails to Gilardi about final notice package and internet placement.	187.50 HOLD
08/04/11 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Emails from Gilardi re: claims and notice .	125.00 HOLD

Fees and Expenses by Matter

Period: 01/01/1990-09/26/2011

Date Status	Timekeeper	Transaction Type Description	Amount
08/05/11 Hold	DC	Fee: 0.80 hours @ \$625.00/hour Email from Alan Vasquez; call to Alan Vasquez; review notice form; email to Alan Vasquez.	500.00 HOLD
08/05/11 Hold	DC	Fee: 0.30 hours @ \$625.00/hour Emails from and to Alan V. at Gilardi re: claims procedures.	187.50 HOLD
08/08/11 Hold	DC	Fee: 0.60 hours @ \$625.00/hour Emails to and from Alan V. re: claims; system operation; email re: press release.	375.00 HOLD
08/19/11 Hold	DC	Fee: 0.50 hours @ \$625.00/hour Emails to and from Gilardi re: publication notice.	312.50 HOLD
08/22/11 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Email from and to Alan V re: claims issues.	125.00 HOLD
08/30/11 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Review weekly claims report.	125.00 HOLD
09/19/11 Hold	DC	Fee: 0.60 hours @ \$625.00/hour Emails from and to Alan Vasquez re: claims, deadline and pending stipulation; review and approve posting for website.	375.00 HOLD
09/20/11 Hold	DC	Fee: 0.60 hours @ \$625.00/hour Call to court calendar clerk and law clerk; prepare and file proposed Order on Aug. stip.	375.00 HOLD
09/20/11 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Overnight mail - to court - courtesy copy of order.	125.00 HOLD
09/20/11 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Email to claims administrator about declaration timing.	125.00 HOLD
09/20/11 Hold	DC	Fee: 4.20 hours @ \$625.00/hour Research and preparation of fee and final approval brief.	2,625.00 HOLD
09/21/11 Hold	DC	Fee: 5.20 hours @ \$625.00/hour Research attorney's fees brief; draft motion; call Hutchinson, draft declaration.	3,250.00 HOLD
09/21/11 Hold	DC	Fee: 0.20 hours @ \$625.00/hour Received and reviewed signed order extending claims date for RUM group, email to Alan Vasquez about same.	125.00 HOLD

Fees and Expenses by Matter

Period: 01/01/1990-09/26/2011

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09/26/11

Date Status	Timekeeper	Transaction Type Description	Amount
09/21/11 Hold	DC	Fee: 1.40 hours @ \$625.00/hour Continued work on final approval and fee briefs and research on same.	875.00 HOLD
09/22/11 Hold	DC	Fee: 0.80 hours @ \$625.00/hour Put together costs total and documentation for fee brief docs.	500.00 HOLD
09/22/11 Hold	DC	Fee: 2.20 hours @ \$625.00/hour Research on fees and final approval briefs, draft same.	1,375.00 HOLD
09/22/11 Hold	DC	Fee: 2.70 hours @ \$625.00/hour Further work on final approval brief and fees brief.	1,687.50 HOLD
09/23/11 Hold	DC	Fee: 1.70 hours @ \$625.00/hour Further research on California vs. federal law on fees.	1,062.50 HOLD
09/23/11 Hold	DC	Fee: 3.70 hours @ \$625.00/hour Work on fees brief; call to claims administrator; email to same.	2,312.50 HOLD
09/23/11 Hold	DC	Fee: 0.80 hours @ \$625.00/hour Call to Jim Dawson; discussion about local practices; prepare fee declaratoin for him to review; email same.	500.00 HOLD
09/23/11 Hold	DC	Fee: 5.80 hours @ \$625.00/hour Further work on fee brief and final approval brief; assemble declarations; further research on multiplier issues; emails to claims admin.; IT consultant; calls to and from claims administrator.	3,625.00 HOLD
09/24/11 Hold	DC	Fee: 7.30 hours @ \$625.00/hour Work on Final Approval brief and supporting documents.	4,562.50 HOLD
09/25/11 Hold	DC	Fee: 6.80 hours @ \$625.00/hour Work on both briefs, final approval and attorney's fees, and supporting documents.	4,250.00 HOLD
09/25/11 Hold	DC	Fee: 1.80 hours @ \$625.00/hour Further work on declarations for both briefs.	1,125.00 HOLD
09/25/11 Hold	DC	Fee: 7.40 hours @ \$625.00/hour Work on briefs and supporting documents; draft and revise both; prepare declarations.	4,625.00 HOLD

Fees and Expenses by Matter

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09/26/11

Date Status	Timekeeper	Transaction Type Description	Amount
09/25/11 Hold	DC	Fee: 0.50 hours @ \$625.00/hour Prepare client's declaration; email to same.	312.50 HOLD
09/26/11 Hold	DC	Fee: 4.60 hours @ \$625.00/hour Finalize fee and final approval briefs; have tables pulled and review; finalize declarations; call to defense counsel MacLeod; receive client's declaration.	2,875.00 HOLD
Matter 312-1 184 transactions		Hours: 234.10 Fees: Expenses:	151,942.50 0.00
184 transactions 1 matter		Hours: 234.10 Fees: Expenses:	151,942.50 0.00

EXHIBIT B

THE NATIONAL LAW JOURNAL

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A nationwide sampling of law firm billing rates

December 10, 2007

The National Law Journal asked the respondents to its 2007 survey of the nation's 250 largest law firms to provide a range of hourly billing rates for partners and associates. The firms that supplied this information — including some firms that are not in the NLJ 250 — are listed below in alphabetical order. We also asked firms to provide average and median billing rates, and several complied. The number after a firm's name indicates the total number of attorneys at the firm. The city listed below the name of a firm is the location of its principal or largest office.

A-F G-L M-R S-W

Adams and Reese (256)
(New Orleans)

Partners \$225-\$500 (average \$305) (median \$300)
Associates \$165-\$255 (average \$198) (median \$197)
Firmwide (average \$278) (median \$275)

Andrews Kurth (396)
(Houston)

Partners \$400-\$795
Associates \$210-\$460

Arent Fox (329)
(Washington)

Partners \$395-\$675
Associates \$240-\$440

Armstrong Teasdale (279)
(St. Louis)

Partners \$295-\$450
Associates \$165-\$295

Baker, Donelson, Bearman, Caldwell & Berkowitz (523)
(Memphis, Tenn.)

Partners \$230-\$525 (average \$325) (median \$320)
Associates \$160-\$315 (average \$205) (median \$200)
Firmwide (average \$280) (median \$270)

Barnes & Thornburg (440)
(Indianapolis)

Partners \$265-\$485 (average \$350) (median \$355)
Associates \$180-\$295 (average \$225) (median \$220)
Firmwide (average \$302) (median \$310)

Bass, Berry & Sims (217)
(Nashville, Tenn.)

Partners \$300-\$575

Associates \$180-\$285

Best Best & Krieger (195)

(Riverside, Calif.)

Partners \$290-\$495 (average \$275) (median \$290)

Associates \$160-\$350 (average \$203) (median \$235)

Firmwide (average \$212) (median \$265)

Bond, Schoenbeck & King (167)

(Syracuse, N.Y.)

Partners \$200-\$435 (average \$294) (median \$295)

Associates \$140-\$250 (average \$179) (median \$175)

Firmwide (average \$253) (median \$300)

Bradley Arant Rose & White (242)

(Birmingham, Ala.)

Partners \$240-\$520 (average \$335) (median \$330)

Associates \$180-\$280 (average \$211) (median \$205)

Firmwide (average \$258) (median \$260)

Briggs and Morgan (178)

(Minneapolis)

Partners \$250-\$500 (average \$391) (median \$395)

Associates \$195-\$325 (average \$233) (median \$230)

Firmwide (average \$344) (median \$350)

Brinks Hofer Gilson & Lione (158)

(Chicago)

Partners \$300-\$650 (average \$479) (median \$485)

Associates \$180-\$410 (average \$273) (median \$250)

Firmwide (average \$365) (median \$350)

Broad and Cassel (175)

(Orlando, Fla.)

Partners \$250-\$450 (average \$361) (median \$360)

Associates \$155-\$310 (average \$232) (median \$225)

Firmwide (average \$294) (median \$275)

Brownstein Hyatt Farber Schreck (177)

(Denver)

Partners \$260-\$675 (average \$373) (median \$390)

Associates \$170-\$270 (average \$219) (median \$217.5)

Firmwide (average \$308) (median \$325)

Bryan Cave (847)

(St. Louis)

Partners \$320-\$695 (average \$493) (median \$490)

Associates \$165-\$495 (average \$295) (median \$295)

Firmwide (average \$394) (median \$375)

Buchanan Ingersoll & Rooney (561)

(Pittsburgh)

Partners \$320-\$750

Associates \$150-\$460

Bullivant Houser Bailey (160)

(Portland, Ore.)

Partners \$225-\$500 (average \$285) (median \$275)

Associates \$150-\$350 (average \$240) (median \$220)

Firmwide (average \$260) (median \$250)

Burr & Forman (182)

(Birmingham, Ala.)

Partners \$250-\$470 (average \$340)

Associates \$175-\$305 (average \$235)

Butzel Long (232)

(Detroit)

Partners \$210-\$575

Associates \$155-\$350

Carlton Fields (259)

(Tampa, Fla.)

Partners \$280-\$600 (average \$406) (median \$405)

Associates \$190-\$375 (average \$243) (median \$245)

Firmwide (average \$312) (median \$300)

Cooley Godward Kronish (567)

(Palo Alto, Calif.)

Partners \$470-\$875

Associates \$250-\$555

Covington & Burling (608)

(Washington)

Partners \$510-\$800

Associates \$240-\$525

Cozen O'Connor (476) (Philadelphia)

Partners \$230-\$750 (average \$420) (median \$425)

Associates \$155-\$530 (average \$283) (median \$280)

Firmwide (average \$350) (median \$340)

Curtis, Mallet-Prevost, Colt & Mosle (221)

(New York)

Partners \$635-\$735 (average \$666) (median \$685)

Associates \$280-\$560 (average \$361) (median \$360)

Firmwide (average \$356) (median \$480)

Davis Wright Tremaine (449)

(Seattle)

Partners \$300-\$695 (average \$430) (median \$422)

Associates \$170-\$390 (average \$257) (median \$250)

Firmwide (average \$375) (median \$375)

Day Pitney (400)

(Florham Park, N.J.)

Partners \$350-\$650 (average \$472) (median \$465)

Associates \$210-\$525 (average \$306) (median \$310)

Firmwide (average \$374) (median \$375)

Dickinson Wright (234)

(Detroit)

Partners \$260-\$530

Associates \$170-\$275

Dickstein Shapiro (388)

(Washington)

Partners \$425-\$825 (average \$552) (median \$550)

Associates \$225-\$440 (average \$336) (median \$360)

Firmwide (average \$438) (median \$425)

Dinsmore & Shohl (316)

(Cincinnati)

Partners \$235-\$475 (average \$342) (median \$340)

Associates \$155-\$285 (average \$199) (median \$190)

Firmwide (average \$275) (median \$250)

Dorsey & Whitney (649)

(Minneapolis)

Partners \$220-\$750 (average \$453) (median \$463)
 Associates \$145-\$470 (average \$274) (median \$260)
 Firmwide (average \$375) (median \$365)

Duane Morris (612)**(Philadelphia)**

Partners \$315-\$705 (average \$475) (median \$475)
 Associates \$150-\$465 (average \$310) (median \$305)
 Firmwide (average \$416) (median \$415)

Dykema Gossett (338)**(Detroit)**

Partners \$245-\$625 (average \$403)
 Associates \$185-\$390 (average \$272)

Edwards Angell Palmer & Dodge (564)**(Boston)**

Partners \$350-\$700 (average \$515) (median \$513)
 Associates \$170-\$450 (average \$293) (median \$280)
 Firmwide (average \$407) (median \$400)

Epstein Becker & Green (384)**(New York)**

Partners \$280-\$675 (average \$471) (median \$475)
 Associates \$155-\$440 (average \$290) (median \$280)
 Firmwide (average \$380) (median \$395)

Fenwick & West (223)**(Mountain View, Calif.)**

Partners \$500-\$775 (average \$590) (median \$600)
 Associates \$245-\$500 (average \$360) (median \$370)
 Firmwide (average \$395) (median \$410)

Foley & Lardner (1,011)**(Milwaukee)**

Partners (average \$550) (median \$550)
 Associates (average \$387) (median \$375)
 Firmwide \$185-\$855
 (average \$476) (median \$475)

Ford & Harrison (190)**(Atlanta)**

Partners \$325-\$560
 Associates \$210-\$395

Fowler White Boggs Banker (209)**(Tampa, Fla.)**

Partners \$230-\$500 (average \$345) (median \$340)
 Associates \$150-\$325 (average \$217) (median \$210)
 Firmwide (average \$303) (median \$300)

Fox Rothschild (417)**(Philadelphia)**

Partners \$240-\$595
 Associates \$190-\$440

Frost Brown Todd (360)**(Cincinnati)**

Partners \$225-\$455 (average \$303) (median \$295)
 Associates \$145-\$255 (average \$190) (median \$170)
 Firmwide (average \$255) (median \$255)

G-L

Gardere Wynne Sewell (284)

(Dallas)

Partners \$350-\$715 (average \$472) (median \$475)

Associates \$220-\$425 (average \$292) (median \$265)

Firmwide (average \$405) (median \$405)

GrayRobinson (205)

(Orlando, Fla.)

Partners \$175-\$500 (average \$319)

Associates \$250 (average \$198)

Firmwide (average \$224)

Greenberg Traurig (1,766)

(New York)

Partners \$300-\$1,000 (average \$490) (median \$500)

Associates \$175-\$505 (average \$311) (median \$310)

Firmwide (average \$407) (median \$415)

Harris Beach (184)

(Rochester, N.Y.)

Partners \$250-\$475

Associates \$140-\$275

Hiscock & Barclay (172)

(Syracuse, N.Y.)

Partners \$220-\$375 (average \$278) (median \$280)

Associates \$160-\$250 (average \$185) (median \$180)

Firmwide (average \$245) (median \$250)

Hodgson Russ (229)

(Buffalo, N.Y.)

Partners \$215-\$645 (average \$337) (median \$350)

Associates \$155-\$395 (average \$219) (median \$205)

Firmwide (average \$254) (median \$250)

Hogan & Hartson (1,092)

(Washington)

Partners \$300-\$850 (average \$600) (median \$590)

Associates \$150-\$525 (average \$385) (median \$370)

Firmwide (average \$490)

Holland & Hart (347)

(Denver)

Partners \$275-\$585 (average \$388) (median \$385)

Associates \$165-\$345 (average \$269) (median \$275)

Firmwide (average \$335) (median \$335)

Holme Roberts & Owen (224)

(Denver)

Partners \$285-\$635 (average \$412) (median \$410)

Associates \$195-\$420 (average \$284) (median \$265)

Firmwide (average \$353) (median \$345)

Howard Rice Nemerovski Canady Falk & Rabkin (114)

(San Francisco)

Partners \$495-\$775

Associates \$275-\$485

Hughes Hubbard & Reed (343)

(New York)

Partners \$595-\$825

Associates \$240-\$560

Husch & Eppenberger (332)

(St. Louis)

Partners \$190-\$425 (average \$297) (median \$295)

Associates \$130-\$260 (average \$179) (median \$175)

Firmwide (average \$246) (median \$245)

Jackson Lewis (416)

(White Plains, N.Y.)

Partners \$235-\$575

Associates \$210-\$450

Jenner & Block (495)

(Chicago)

Partners \$450-\$900 (average \$562) (median \$525)

Associates \$275-\$425 (average \$327) (median \$325)

Jones, Walker, Waechter, Poitevent, Carrère & Denègre (230)

(New Orleans)

Partners \$210-\$600

Associates \$150-\$225

Kelley Drye & Warren (390)

(New York)

Partners \$400-\$800

Associates \$255-\$500

Knobbe, Martens, Olson & Bear (208)

(Irvine, Calif.)

Partners \$340-\$645

Associates \$215-\$420

Lane Powell (175)

(Seattle)

Partners \$300-\$515 (average \$370) (median \$370)

Associates \$205-\$300 (average \$255) (median \$255)

Firmwide (average \$345) (median \$345)

Lathrop & Gage (271)

(Kansas City, Mo.)

Partners \$225-\$450 (average \$300) (median \$300)

Associates \$140-\$300 (average \$185) (median \$185)

Firmwide (average \$215) (median \$260)

Leonard, Street and Delnord (199)

(Minneapolis)

Partners \$300-\$500

Associates \$185-\$300

Lewis, Rice & Fingersh (165)

(St. Louis)

Partners \$240-\$425

Associates \$130-\$295

Lindquist & Vennum (174)

(Minneapolis)

Partners \$260-\$500

Associates \$165-\$260

Locke Liddell & Sapp (421)

(Dallas)

Partners \$375-\$900 (average \$486) (median \$490)

Associates \$190-\$390 (average \$261) (median \$280)

Firmwide (average \$399) (median \$425)

Loeb & Loeb (280)

(Los Angeles)

Partners \$475-\$875 (average \$606) (median \$600)

Associates \$240-\$500 (average \$384) (median \$400)

Firmwide (average \$505) (median \$500)

Lord, Bissell & Brook (290)

(Chicago)

Partners \$335-\$690 (average \$473) (median \$475)

Associates \$200-\$410 (average \$299) (median \$300)

Firmwide (average \$410) (median \$415)

Lowenstein Sandler (271)

(Roseland, N.J.)

Partners \$380-\$725

Associates \$205-\$395

Luce, Forward, Hamilton & Scripps (186)

(San Diego)

Partners \$325-\$725 (average \$465) (median \$475)

Associates \$220-\$450 (average \$281) (median \$260)

Firmwide (average \$381) (median \$395)

M-R

Manatt, Phelps & Phillips (320)

(Los Angeles)

Partners \$520-\$785 (average \$600) (median \$590)

Associates \$265-\$480 (average \$395) (median \$415)

Firmwide (average \$518) (median \$550)

Marshall, Dennehey, Warner, Coleman & Goggin (379)

(Philadelphia)

Partners \$135-\$400

Associates \$120-\$300

McCarter & English (400)

(Newark, N.J.)

Partners \$325-\$650

Associates \$205-\$395

McElroy, Deutsch, Mulvaney & Carpenter (238)

(Morristown, N.J.)

Partners \$295-\$450 (average \$250) (median \$235)

Associates \$135-\$225 (average \$180) (median \$165)

Firmwide (average \$195) (median \$215)

McKee Nelson (224)

(New York)

Partners \$635-\$920 (average \$760) (median \$755)

Associates \$375-\$595 (average \$446) (median \$455)

Firmwide (average \$489) (median \$475)

Michael Best & Friedrich (224)

(Milwaukee)

Partners \$225-\$550 (average \$363) (median \$350)

Associates \$185-\$300 (average \$234) (median \$235)

Firmwide (average \$321) (median \$325)

Miles & Stockbridge (212)

(Baltimore)

Partners \$315-\$535 (average \$497)

Associates \$205-\$405 (average \$260)

Miller, Canfield, Paddock and Stone (378)

(Detroit)

Partners \$265-\$595 (average \$400) (median \$400)
 Associates \$150-\$340 (average \$225) (median \$220)
 Firmwide (average \$285) (median \$335)

Miller & Martin (185)

(Clatsanocga, Tenn.)

Partners \$230-\$580 (average \$338) (median \$340)
 Associates \$160-\$295 (average \$201) (median \$195)
 Firmwide (average \$305) (median \$320)

Montgomery, McCracken, Walker & Rhoads (136)

(Philadelphia)

Partners \$320-\$575 (average \$419)
 Associates \$195-\$320 (average \$260)
 Firmwide (average \$350)

Moore & Van Allen (284)

(Charlotte, N.C.)

Partners \$265-\$765
 Associates \$175-\$330

Morgan, Lewis & Bockius (1,384)

(Philadelphia)

Partners \$375-\$850
 Associates \$200-\$575

Morris, Manning & Martin (170)

(Atlanta)

Partners \$350-\$625 (average \$436) (median \$395)
 Associates \$180-\$400 (average \$285) (median \$310)
 Firmwide (average \$380) (median \$440)

Naxsen Pruet Adams Kleemeter (171)

(Columbia, S.C.)

Partners \$220-\$420
 Associates \$150-\$250

Ogletree, Deakins, Nash, Smoak & Stewart (392)

(Greenville, S.C.)

Partners \$270-\$575 (average \$348)
 Associates \$200-\$360 (average \$256)
 Firmwide (average \$312)

Patton Boggs (518)

(Washington)

Partners \$320-\$920 (average \$536) (median \$525)
 Associates \$205-\$520 (average \$375) (median \$385)
 Firmwide (average \$456) (median \$455)

Pepper Hamilton (500)

(Philadelphia)

Partners \$335-\$750
 Associates \$200-\$425

Perkins Cole (619)

(Seattle)

Partners \$205-\$805
 Associates \$145-\$500

Phelps Dunbar (280)

(New Orleans)

Partners \$170-\$450 (average \$247)

Shughart Thomson & Kilroy (172)
(Kansas City, Mo.)
Partners \$235-\$475
Associates \$160-\$225

Shumaker, Loop & Kendrick (171)
(Toledo, Ohio)
Partners \$200-\$465 (average \$311) (median \$305)
Associates \$180-\$350 (average \$221) (median \$220)
Firmwide (average \$259) (median \$300)

Sillis Cummis Epstein & Gross (178)
(Newark, N.J.)
Partners \$350-\$650
Associates \$195-\$375

Smith, Gambrell & Russell (185) (Atlanta)
Partners \$250-\$575
Associates \$175-\$345

Snell & Wilmer (438) (Phoenix)
Partners \$275-\$675 (average \$390)
~~Associates \$170-\$390 (average \$248)~~

Steptoe & Johnson PLLC (180)
(Clarksburg, W.Va.)
Partners \$200-\$325
Associates \$170-\$250

Stinson Morrison Hecker (352)
(Kansas City, Mo.)
Partners \$230-\$600 (average \$333) (median \$365)
Associates \$175-\$250 (average \$207) (median \$225)
Firmwide (average \$295) (median \$285)

Steel Rives (342) (Portland, Ore.)
Partners \$275-\$500 (average \$379) (median \$375)
Associates \$160-\$350 (average \$231) (median \$230)
Firmwide (average \$324) (median \$330)

Strasburger & Price (178) (Dallas)
Partners \$225-\$560 (average \$367) (median \$363)
Associates \$200-\$395 (average \$234) (median \$223)
Firmwide (average \$326) (median \$322)

Sullivan & Worcester (170) (Boston)
Partners \$415-\$700 (average \$550) (median \$540)
Associates \$245-\$420 (average \$309) (median \$290)
Firmwide (average \$438) (median \$440)

Sutherland Asbill & Brennan (511)
(Atlanta)
Partners \$375-\$715 (average \$511) (median \$500)
Associates \$215-\$415 (average \$292) (median \$280)
Firmwide (average \$335) (median \$305)

Thacher Proffitt & Wood (310)
(New York)
Partners \$525-\$795 (average \$574) (median \$700)
Associates \$275-\$495 (average \$353) (median \$365)
Firmwide (average \$426) (median \$395)

Thompson Coburn (320)
(St. Louis)

Partners \$265-\$580
 Associates \$170-\$370

Thompson & Knight (414)
 (Dallas)

Partners \$370-\$730 (average \$496) (median \$485)
 Associates \$205-\$370 (average \$295) (median \$310)
 Firmwide (average \$415) (median \$400)

Ulmer & Berne (174)
 (Cleveland)

Partners \$240-\$470 (average \$343)
 Associates \$165-\$290 (average \$212)
 Firmwide (average \$283)

Vedder, Price, Kaufman & Kamholz (255)
 (Chicago)

Partners \$335-\$650 (average \$430) (median \$425)
 Associates \$205-\$410 (average \$281) (median \$370)
 Firmwide (average \$372) (median \$365)

Wiggin and Dana (146)

(New Haven, Conn.)

Partners \$295-\$590
 Associates \$195-\$350

Williams Mullen (314)

(Richmond, Va.)

Partners \$300-\$600
 Associates \$205-\$425

Wilmer Cutler Pickering Hale and Dorr (1,051)
 (Washington)

Partners \$475-\$1,000
 Associates \$215-\$495

Winstead (306)

(Dallas)

Partners \$345-\$620
 Associates \$180-\$360

Winston & Strawn (912)

(Chicago)

Partners \$400-\$845 (average \$608)
 capital partner/\$515 income partner (median \$640 capital partner/\$565 income partner)
 Associates \$200-\$590 (average \$365) (median \$395)
 Firmwide (average \$455) (median \$523)

Wornble Carlyle Sandridge & Rice (510)

(Winston-Salem, N.C.)

Partners \$290-\$575 (average \$426) (median \$425)
 Associates \$195-\$370 (average \$268) (median \$265)
 Firmwide (average \$355) (median \$360)

EXHIBIT C

Attorneys for Plaintiff
Patrick Grannan

10-CV-02803 HRL

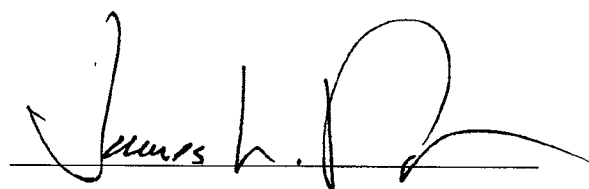
1 Market Street, Suite 1200, San Jose, California. I have been a practicing attorney in this
2 geographical area since 1977 and I am familiar with the local billing customs and practices. I have
3 been engaged in litigation throughout my career.

4 3. I have had the opportunity to observe the fees charged by other counsel in
5 this legal community. I understand Douglas Campion is requesting an award of fees based upon a
6 percentage of the common fund obtained in settlement. Because the 9th Circuit authority permits a
7 court to also review a fee applicant's lodestar, i.e., hourly rate times the hours incurred, I understand
8 Mr. Campion is submitting his lodestar in the event the court seeks to use a lodestar analysis in
9 some capacity.

10 4. I am informed Mr. Campion's lodestar is based upon his hourly billing rate of
11 \$625 per hour in this class action alleging violations of the Telephone Consumer Protection Act.
12 Based upon my experience, that hourly rate of \$625 is within the range of what is reasonable for
13 serving as lead counsel in a class action in the legal community practicing in the Northern
14 California District of California. That belief is also supported by my understanding of Mr.
15 Campion's 34 years of litigation experience, and his litigation of class actions for more than 20 of
16 those years.

17 I declare under penalty of perjury that the above is true and correct. Executed
18 pursuant to the laws of the United States at San Jose, California on September 23, 2011.

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James L. Dawson

EXHIBIT D

GRANNAN V. ALLIANT LAW GROUP**COSTS INURRED IN LITGATION BY THE LAW OFFICES OF DOUGLAS J. CAMPION****I. Paid / Incurred by Class Counsel:**Court Fees:

6-24-2010	Filing fee		\$350.00
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Overnight Mail Delivery Costs (Overnight Express, Norco):

8-16-10		\$ 19.13	
8-31-10		19.13	
10-28-10		18.12	
11-24-10		16.95	
12-1-10		16.95	
1-4-11		18.65	
5-4-11		33.96	
6-21-11		21.00	
9-20-11		<u>20.72</u>	
Total:		\$174.61	\$174.61

Attorney Service (Knox):

9-30-10		70.00	
8-30-11		89.00	
Total:		\$159.00	\$159.00

Travel Expenses:Airfare:

9-30-11	Southwest Airlines	314.40
	(For Sept. 7, 2011 hearing)	
7-30-11	Southwest Airlines	162.00

(For Nov. 1, 2011 hearing)

Car Rental:

9-7-10	Car rental for 9-7-10 hearing	56.38
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(Car rental will be needed for

Nov. 1, 2011 Hearing)

Total Travel Expenses to date:	<u>\$ 532.78</u>
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Total Costs of Litigation to Date by Class Counsel's office:	\$1,216.39
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II. Information Technology Consultant Hansen Levey

Forensics (Invoice -- Campion Declaration as Exhibit C)	\$14,316.59
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Total Costs Paid by or through Class Counsel

for which reimbursement is requested:	\$15,532.89
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EXHIBIT E

Jeffrey A. Hansen
San Diego, CA 91977
(954) 302-7646
Email: Jeff@hlforensics.com

SUMMARY OF QUALIFICATIONS:

IT certified professional with over 20 years of extensive troubleshooting experience

AREAS OF EXPERTISE:

Communication Systems	Component level troubleshooting	Tactical Data Systems
Security	Microcomputers	Training
Electronic Theory	Computer Networking	TCP/IP
Windows 2000	Windows NT 4.0	Exchange 2000
Linux	BIND	POSTFIX
Disaster Recovery	Windows .NET (2003 Server)	Windows XP
Sparc	HIPAA	Network Management
Computer Forensics	Access Data FTK	E-Discovery

PROFESSIONAL EXPERIENCE:

2007-Present Co-Founder

Hansen and Levey Forensics, Ft Lauderdale, FL

- Established and incorporated Hansen & Levey Forensics, Inc in 2007
- Established secure forensics laboratory for the San Diego office.
- Developed operating procedures for computer forensic examinations.
- Developed proper protocols in preserving electronic evidence and following chain of custody.
- Provided Forensic services for clients for class action, employment, civil, domestic, and juvenile cases.
- Oversee all discovery phase of cases.
- Assist counsel in interrogatories, depositions, and meet and confer meetings, and preparation for sanction hearings against opposing counsel and parties.
- Provided expert testimony in Braun v Casey.
- Awarded consultant fees in Kevin Lemieux v. Global Credit & Collection Corp.
- Participated in Meet and Confer, 26f conferences and misc pre-trial meetings.
- Assisted counsel in developing litigation strategies in cases
- Assisted counsel in preparing discovery including interrogatories and document requests
- Assisted counsel in evaluating responses to interrogatories and document requests
- Assisted in counsel in witness examination in depositions

2000-Present Owner

Pns724 San Diego, CA

- Provided complete IT solutions for hundreds of businesses and individuals including network design, configuration, forensics, and data recovery.
- Set up and maintained 480 line outbound call center with numerous auto dialers and predictive dialers. Maintained call lists, and DNC lists used to place hundreds of millions of calls over a five year period.
- Installed hundreds of POTS lines, "Turned up" at least 38 T1's and PRI's.

2006 San Diego Regional Computer Forensics Laboratory (FBI sponsored computer forensics Lab)

- Built several forensic machines with large fiber channel RAID assemblies for use in the field.
- Installed and configured systems for mobile laboratory
- Provided support in all areas from taking in evidence to calling case agents to pick up their evidence from finished cases gaining valuable experience in evidence handling.

2004-Present Systems Analyst

Amsec San Diego, CA / Lateott Bremerton, WA / HP Enterprise Services

- Provided ATM and Ethernet fiber connectivity for secure and unsecured DOD networks.
- Troubleshoot fiber connectivity issues on shore and ship facilities.

**2000-2004 Director of Training/ IT Director
Laptop Training Solutions, San Diego, CA**

- Provided Intrusion detection, incident response, and forensic services in a continuing effort keep the network and workstations secure.
- Planned, designed, and implemented network security for vital network services for 4 facilities, that were heavily attacked by varying methods, saving the company hundreds of thousands of dollars.
- Performed security risk assessment, performed IT control audits, developed countermeasures and provided a security policy to insure confidentiality, integrity and availability of resources.
- Performed Gap Analysis of existing systems and desired systems and migrated from Windows 2000 DNS and Exchange 2000 servers to Linux servers running Postfix and BIND to provide a more scalable network for 4 facilities providing the company the means to achieve a 450% growth.
- Planned, installed and maintained several school networks involving numerous Domain Controllers, UNIX servers, print servers, multiple nodes and routers.
- Installed and programmed Nortel phone system improving the company's ability to handle calls.
- Planned, organized and instructed computer certification courses including Microsoft Certified Systems Engineer (NT4.0, Win2000 MCSE, 2003 MCSE), Cisco (CCNA), A+, N+, Linux+, I-Net+, Security+, MOUS and Web Page Design (HTML, Javascript, DHTML, Flash 4, Flash 5, Fireworks3, Photoshop 5) resulting in hundreds of certified students.
- Provided students with a hands on training environment involving networks with Multiple Windows NT and Windows 2000 Domain Controllers, several workstations (Windows 95,98,NT,ME, and 2000 Professional), Novell, Unix, and Exchange Servers, and Cisco routers.
- Planned, organized and instructed a corporate training environment for TCP/IP which included addressing, standards, troubleshooting, subnetting, routing and Frame Relay
- Provided long distance support via telephone to hundreds of MCSE students throughout the country.
- Managed other instructors on training techniques for the MCSE, CCNA, Linux+, A+, Security+ and Network + courses providing a consistent system of training in all facilities.

**1998-2000 Electronic Test Technician 3
Action Instruments, San Diego, CA**

- Tested various types of electronics for industry and signal conditioning.
- Troubleshoot and documented nearly 10,000 component level repairs.

- Assisted in improvements to the manufacturing process.
- Identified problems in product design and provided solutions to correct the problems.

1996-1997 Network, Computer and Computer Monitor Technician /Instructor

United States Navy, Shore Intermediate Maintenance Activity, San Diego, CA

- Installed and connectorized fiber optic computer networks throughout Naval Station San Diego and North Island.
- Provided network troubleshooting and management for large scale mission-critical DoD networks with over 600 nodes, routers, and servers.
- Provided upgrades, maintenance, troubleshooting, security, and repair of personal computers for 600 station LAN and the US Pacific Fleet.
- Troubleshoot and repaired over 100 computer monitors to component level without technical manuals.
- Increased successful monitor repair from 10% to 95%.
- Trained shop personnel on computer monitor troubleshooting and repair.
- Researched parts, materials and techniques for Computer Monitor repair.
- Developed curriculum and instructed monitor troubleshooting and repair for the Navy Microcomputer Repair course.

1993-1996 Electronics Technician / Computer Technician

United States Navy, USS Mahlon S. Tisdale (FFG-27), Combat Systems Division.

- Provided incident response and performed forensic type of services for 36 computers following Employee sabotage.
- Troubleshoot and maintained Harris 300 AN/UYK-62(V) mini-mainframe, running Vulcan OS, and all terminals
- Troubleshoot, maintained, and upgraded hardware and software for 36 shipboard computers.
- Identified security threats, and developed countermeasures for computer systems on board.
- Troubleshoot, repaired and maintained – at component level - various Univac systems making up a complex network of computers used in communications, navigation, and weapons guidance.
- Assisted in planning and running work center.

1990-1992 Radio, Television, VCR Technician

LBJ Television, Wheat Ridge, CO

- Performed component level troubleshooting of televisions, VCRs, and stereos.
- Performed in home repair of televisions.
- Introduced the repair of CD players to the company.
- Provided technical support to customers over the telephone.
- Handled customer service issues related to television repair.

CERTIFICATIONS:

MCP 4.0, A+, Network+, MCP 2000, MCSA, MCSE, Linux+, I-Net+, Security+, CIW Security Analyst.

Certified by Bureau For Private Postsecondary And Vocational Education, in the States of California and Oregon, as an Instructor for Computer Installation and Repair Technology, Computer Systems Networking and Telecommunications, Micro Computer Applications, Microsoft, Windows, Excel

GUEST APPEARANCES:

- Featured in Microsoft Redmond Magazine Sep 2007
- Computer Talk 760 KFMB San Diego, CA
- Computer Bits KBNP 1410AM and KOHI 1600 Portland, OR
- San Diego Profiler 760 KFMB San Diego, CA

EDUCATION:

2006	Access Data Forensic Toolkit San Diego Regional Computer Forensics Laboratory, San Diego, CA
2006	Guidance Software Encase Forensic Suite San Diego Regional Computer Forensics Laboratory, San Diego, CA
2005	E-discovery – Why Digital is different – by Craig Ball San Diego County Bar Association, San Diego, CA
2003	Security: Hardening MS Windows 2000 Server Family, IIS and Exchange 2000 Servers CBI Systems Integrators, San Diego, CA
1996	Navy Standard Microcomputer Repair PRC Inc., San Diego, CA
1996	Fundamentals of Total Quality Management/ Team Skills and Concepts Shore Intermediate Maintenance Activity, San Diego, CA
1993	AN/SPS-55 Surface Search Radar Service School Command, San Diego, CA
1993	Advanced Electronics School, Communication Systems and Radar Systems Naval Training Center, Great Lakes, IL
1992	Electronic Theory Naval Training Center, Orlando, FL
1990-1991	Radio, Television, VCR Repair Warren Occupational Technical Center, Golden, CO
1989-1990	Electronic Theory Warren Occupational Technical Center, Golden, CO
1991	Columbine Sr. High School, Littleton, CO

SECURITY CLEARANCE: Secret

References available on request

EXHIBIT F

Hansen & Levey Forensics, Inc.

PO Box 813210 / Hollywood, FL 33081

954-302-7646

Invoice submitted to:

Douglas J. Campion, Esq.
 Law Offices of Douglas J. Campion
 409 Camino del Rio S
 Suite #303
 San Diego CA 92108

September 23, 2011

Reference: Grannan vs. Alliant Law Group

Invoice #1014

Professional Services

			<u>Hours</u>	<u>Amount</u>
11/15/2010	JAH	Meeting with Doug Campion, Esq. regarding case.	1.00	250.00
	JAH	Configured server for new case.	17.00	4,250.00
	JAH	Telephone call with Keith Levey regarding strategy.	2.00	500.00
	KPL	Telephone call with Jeff Hansen regarding strategy.	2.00	500.00
11/16/2010	JAH	Setup database, imported data, checked for inconsistencies and ran NANPA comparison; found bad data in provided XLSX files; needed to start over in order to correct issue.	5.15	1,287.50
	JAH	Telephone call with Doug Campion, Esq. regarding status.	0.50	125.00
	JAH	Telephone call with Keith Levey regarding status / new strategy.	1.50	375.00
	KPL	Telephone call with Jeff Hansen regarding status / new strategy.	1.50	375.00
	JAH	Manually edited CSV file in order to correct multiple formatting issues.	3.00	750.00
	JAH	Re-Setup database, imported data, checked for inconsistencies, indexed and ran NANPA comparison. Deduped and also verified against ported numbers.	4.90	1,225.00
3/6/2011	JAH	Telephone call with Keith Levey regarding status.	0.75	187.50
	KPL	Telephone call with Jeff Hansen regarding status.	0.75	187.50

Douglas J. Campion, Esq.

Page 2

	<u>Hours</u>	<u>Amount</u>
3/6/2011 KPL Review of findings for accuracy.	7.50	1,875.00
JAH Telephone call with Doug Campion, Esq. regarding status.	0.50	125.00
JAH Prepared final list of calls made that also contain addresses.	6.10	1,525.00
JAH Verified all data to confirm accuracy.	2.00	500.00
	<hr/>	<hr/>
For professional services rendered	56.15	\$14,037.50
Additional Charges :		
	<u>Qty/Price</u>	
11/15/2010 JAH 2 - 1 TB Harddrives	2	160.00
	80.00	
JAH Microsoft Office 2010	1	119.00
	119.00	
	<hr/>	<hr/>
Total costs		\$279.00
	<hr/>	<hr/>
Total amount of this bill		\$14,316.50

EXHIBIT G

March 14, 2011

Doug Campion, Esq.
 Law Offices of Douglas J. Campion
 Matter: Grannan v. Alliant Law Group, P.C.



Administration Cost Estimate Summary				
ASSUMES FULL ADMINISTRATION WITH CLAIMS PROCESSING AND DISTRIBUTION SERVICES				
Total Estimated Class Size	137,981			
	Filing Percentage and Number of Claims Filed			
	1%	5%	10%	30%
	1,380	6,899	13,798	41,394
SERVICES				
Notification Procedures	\$ 110,937	\$ 110,937	\$ 110,937	\$ 110,937
Processing/Reporting	3,685	7,134	10,929	28,866
Distribution	12,425	21,199	25,548	52,425
Total Estimated Administration Costs	\$ 127,047	\$ 139,270	\$ 147,414	\$ 192,228

ITEMIZED ADMINISTRATION COSTS**NOTIFICATION PROCEDURES****Document Formatting & Class Data Preparation**

Case Setup (Planning, Consulting, Case Start Mtg)
 Mailing Database Preparation
 Software Customization
 Document Formatting
 Case Management
 NCOA
 Subtotal Formatting & Data Prep

<u>Volume</u>	<u>Unit Rate</u>	<u>Cost</u>	<u>Total</u>
5 hrs	\$ 90.00	\$ 450	
25 hrs	\$ 90.00	2,250	
5 hrs	\$ 90.00	450	
3 hrs	\$ 90.00	270	
40 hrs	\$ 90.00	3,600	
		660	
			\$ 7,680

Publication

Publish 1/8 page (approx. 5.37" x 5.18") in National Edition of USA Today (any day Mon thru Th)

22,262.

Printing/Mailing

Notice Packet:

137,981 \$ 0.052 \$ 7,143

4-1/4" x 6" Postcard Notice

Estimated 1st Class Postage

137,981 \$ 0.22 30,356

Print Production Staff Hours

5 hrs \$ 90.00 450

Subtotal Printing/Mailing

37,948

Printing/Mailing - CAFA Mailing

Mail CAFA Packet to 50 States' Attorney General and U.S. Attorney General:

3,500

- Includes Registered Mail postage & print production time

Returned Undeliverable Mail Handling ("RUM")

Total % & # of RUM Pieces

15% 20,697

Address Searches

of Searches (from RUM above)

20,697 \$ 0.25 \$ 5,174

Class List Contains SSNs? (Y/N)

Y

of New Addresses Found and Remailled

90% 18,627 \$ 0.50 9,314

Staff Hours performing Addr Searches & Remailers

20 hrs \$ 90.00 1,800

Subtotal Address Searches

16,288

Automated Telephone Support (IVR)

Telephone Support - 800# (IVR w/transfer to live support)

One-Time Setup

\$ 1,500

Lookup enhancement for callers to check their class member status by SSN & file claims

5,000

Script Development

5 hrs \$ 90.00 450

Monthly Charges

6 mos 100 600

Line Charges

IVR - % of class calling & estimated # of calls seeking general info

2% 2,760

Minutes per call

5

Total estimated IVR minutes

13,798 \$ 0.15 2,070

IVR - % of class calling & est # of callers filing claims through tele support

0.5%

690

Minutes per call

6

Total estimated IVR minutes

4,139 \$ 0.15 621

Cost includes line charges and transcriptions

Live operators - % rollover to a live operator

25%

862

Minutes per call

3

Staff hours handling live calls

43 \$ 70.00 3,018

Cost includes line charges and staff time

Subtotal Estimated Automated Telephone Support

13,259

Website Development

Case-dedicated website to host case information, court documents, and allow online claims filing

10,000

Subtotal Notification Procedures**\$ 110,937**

NOTE: See Page 2 for Itemized Claims Processing & Distribution Costs

Doug Campion, Esq.
 Law Offices of Douglas J. Campion
 Matter: Grannan v. Alliant Law Group, P.C.

Protected Claim Forms or Policy Reinstatement Elections Filed (% and # of Claims)									
PROCESSING/REPORTING	Unit Rate	1%		5%		10%		30%	
		Volume	Cost	Volume	Cost	Volume	Cost	Volume	Cost
Claims Processing (cost per claim #'s reflect rounding)									
Cost per Claim for 1,380 Claims Filed via Website	\$1.25								
Cost per Claim for 6,899 Claims Filed via Website	\$0.75								
Cost per Claim for 13,798 Claims Filed via Website	\$0.65								
Cost per Claim for 41,394 Claims Filed via Website	\$0.65								
Estimated Number of Claim Forms filed thru Website	100%	1,380	\$ 1,725	6,899	\$ 5,174	13,798	\$ 8,969	41,394	\$ 26,906
Request For Exclusion Processing									
Estimated Number of Opt-outs		100		100		100		100	
Staff Hours Handling Requests for Exclusion	\$ 70.00	3 hrs	210	3 hrs	210	3 hrs	210	3 hrs	210
Reporting/Declaration									
Declaration of Notice Procedures	\$ 70.00	10 hrs	700	10 hrs	700	10 hrs	700	10 hrs	700
Assumes reporting 1x per week	\$ 70.00	15 hrs	1,050	15 hrs	1,050	15 hrs	1,050	15 hrs	1,050
Subtotal Processing/Reporting			\$ 3,685		\$ 7,134		\$ 10,929		\$ 28,866
DISTRIBUTION									
Settlement Fund Management (Incl. obtaining Tax ID)	\$ 90.00	5 hrs	\$ 450	5 hrs	\$ 450	5 hrs	\$ 450	5 hrs	\$ 450
Distribution Calculations	\$ 90.00	8 hrs	720	10 hrs	900	10 hrs	900	15 hrs	1,350
Distribution Preparation	\$ 90.00	15 hrs	1,350	20 hrs	1,800	20 hrs	1,800	20 hrs	1,800
% & # of Claimants receiving checks	100%	1,380		6,899		13,798		41,394	
Check Issue Rate (volume dependent)		\$ 2.25		\$ 1.50		\$ 1.00		\$ 0.95	
Issue Checks		1,380	3,105	6,899	10,349	13,798	13,798	41,394	39,325
Settlement Fund Tax Reporting	\$ 2,500.00	2	5,000	2	5,000	2	5,000	2	5,000
Staff Hours Handling Check Re-issues	\$ 90.00	5 hrs	450	10 hrs	900	15 hrs	1,350	20 hrs	1,800
Final Accounting Services	\$ 90.00	15 hrs	1,350	20 hrs	1,800	25 hrs	2,250	30 hrs	2,700
Subtotal Distribution			\$ 12,425		\$ 21,199		\$ 25,548		\$ 52,425

EXHIBIT H



3301 Kerner Blvd.
 San Rafael, CA 94901
 P: (415) 461-0410
 F: (415) 461-0412

September 23, 2011

Douglas J Champion, Esq.
 Law Offices of Douglas J Champion
 409 Camino Del Rio South, Suite 303
 San Diego, CA 92108

Re: **Patrick Grannan v. Alliant Law Group, PC**
 Client Matter Number 3684
 Invoice: 3684-1

Professional services, out-of-pocket expenses and third party expenses in connection with Case Setup, Mailing Database Preparation, Software Customization, Case Management, Printing & Mailing of Notice, CAFA Mailing, Publication of Summary Notice, RUM Processing, Website Development, Telephone Support, Claims Processing, Distribution, Reporting and Tax Compliance for the **Patrick Grannan v. Alliant Law Group, PC** matter.

Notification

Case Setup	\$ 450.00	
Mailing Database Preparation	2,795.00	
Software Customization	450.00	
Document Formatting & Proofing	312.50	
Case Management	4,492.50	
NCOA	660.00	
Translation	1,812.00	
Print Production	450.00	
Printing	5,628.79	
Postage	24,282.96	
Notice Requests – 63 @ \$0.50	31.50	
CAFA Mailing	3,500.00	
Publication	22,262.00	
RUM Processing	5,655.00	
RUM Search – 9,638 @ \$0.25	2,409.50	
Remails – 3,920 @ \$0.50	1,960.00	
Staff Time	1,800.00	
Website Development	10,000.00	
Telephone Setup	1,500.00	
Lookup Enhancement	5,000.00	
Script Development	450.00	
Line Charges/Taxes/Fees	1,417.50	
Staff Time	<u>8,242.50</u>	
Subtotal Notification		\$ 104,688.50

continued

Patrick Grannan v. Alliant Law Group, PC

Client Matter Number 3684

Invoice: 3684-1

Page 2

Processing

Claims Processing – 2,096 @ \$0.75	1,551.75
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Distribution

Settlement Fund Management	\$ 450.00	
Distribution Calculation	900.00	
Distribution Preparation	1,800.00	
Check Issuance – 2,000 @ \$1.50	3,000.00	
Handling Check Reissues	900.00	
Final Accounting Services	<u>1,800.00</u>	
Subtotal Distribution		8,850.00

Reporting

Report/Declaration	\$ 1,750.00	
Tax Compliance – 2 yrs	<u>5,000.00</u>	
Subtotal Reporting		<u>6,750.00</u>

AMOUNT DUE	<u>\$121,840.25</u>
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